

## Chiccine, Catherine

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**From:** Knowles, Susan B <SKnowles@ameren.com>  
**Sent:** Monday, November 7, 2022 9:46 AM  
**To:** Chiccine, Catherine  
**Subject:** FW: City Water Plant Effluent Sampling

Please see latest request from the City.

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**From:** Meyer, Lisa A <LMeyer2@ameren.com>  
**Sent:** Monday, November 7, 2022 9:27 AM  
**To:** Knowles, Susan B <SKnowles@ameren.com>; Joseph Madonia (jmadonia@btlaw.com) (jmadonia@btlaw.com) <jmadonia@btlaw.com>  
**Cc:** Miller, Barbara J <BMiller2@ameren.com>; Giesmann, Craig J <CGiesmann@ameren.com>  
**Subject:** FW: City Water Plant Effluent Sampling

The City's response to our one-time effluent work plan.

You can always assume I will never reply to these without first consulting with you all first.

Lisa

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**From:** Paul Michalski <[paul.michalski@212environmental.com](mailto:paul.michalski@212environmental.com)>  
**Sent:** Monday, November 7, 2022 9:07 AM  
**To:** Meyer, Lisa A <[LMeyer2@ameren.com](mailto:LMeyer2@ameren.com)>  
**Cc:** Miller, Barbara J <[BMiller2@ameren.com](mailto:BMiller2@ameren.com)>; Todd Aseltyne <[todd.aseltyne@212environmental.com](mailto:todd.aseltyne@212environmental.com)>; [Nicholas.Galla@stcharlescitymo.gov](mailto:Nicholas.Galla@stcharlescitymo.gov); [john.phillips@stcharlescitymo.gov](mailto:john.phillips@stcharlescitymo.gov); Howell, Tonya <[howell.tonya@epa.gov](mailto:howell.tonya@epa.gov)>; Sperry, Clint <[Sperry.Clint@epa.gov](mailto:Sperry.Clint@epa.gov)>; Brown, Randolph <[Brown.Randolph@epa.gov](mailto:Brown.Randolph@epa.gov)>; [feyi.ilesanmi@dnr.mo.gov](mailto:feyi.ilesanmi@dnr.mo.gov); McDonald, Brenna <[brenna.mcdonald@dnr.mo.gov](mailto:brenna.mcdonald@dnr.mo.gov)>  
**Subject:** [EXTERNAL] RE: City Water Plant Effluent Sampling

### **EXTERNAL SENDER STOP.THINK.QUESTION.**

Verify unexpected requests before opening links or attachments.

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Lisa -

Thank you for providing the work plan to address the City of St. Charles request to the United States Environmental Protection Agency (USEPA) and Missouri Department of Natural Resources (Missouri DNR) submitted on August 18, 2022. This request was in response to the June 2022 laboratory analytical results that indicated concentrations of vinyl chloride and cis-1,2-dichloroethene had increased significantly in monitoring well MW-C17 since the previous groundwater sampling conducted in November 2021. Vinyl chloride exceeded the maximum contaminant level (MCL) in groundwater sampled from well MW-C17. Monitoring well MW-C17 is located approximately 275 feet up-gradient of production well CW-8. Vinyl chloride and cis-1,2-dichloroethene were also measured in recent groundwater samples collected from the production well CW-8 and the City of St. Charles influent when this production well is operating. As such, the City of St. Charles had requested that the responsible parties take the following actions to ensure the continued protection of the City's drinking water source:

- Conduct weekly sampling and laboratory analysis of the constituents of concern including vinyl chloride and cis-1,2-dichloroethene from the influent and effluent at the water treatment plant

- Collect biweekly sampling and laboratory analysis of the constituents of concern from groundwater within monitoring well MW-C17 and production well CW-8 (similar to the actions being taken at piezometer PZ-11 and production well CW-6)

To date, the City of St. Charles has been collecting weekly samples from the influent and effluent at the water treatment plant to monitor for volatile organic constituents in the groundwater. The City has been conducting this monitoring at its own expense. In addition, the City of St. Charles has ceased operation of production well CW-8 in response to the detections of vinyl chloride and cis-1,2-dichloroethene in the water samples. This brings the total number of production wells that have been shut down due to contamination to four (CW-4, CW-5, CW-6, and CW-8). It should be noted that vinyl chloride was detected at the MCL in the most recent groundwater sample collected in the City of St. Charles production well CW-6 within the sample collected by Ameren.

The work plan that you submitted only partially addresses the request made by the City of St. Charles to the USEPA and Missouri DNR. It does not include sampling of the influent at the water treatment plant, nor does it indicate the frequency of future monitoring. Furthermore, the work plan makes no mention of biweekly sampling and laboratory analysis of groundwater from monitoring well MW-C17 and production well CW-8.

In addition, the City of St. Charles would like to reiterate the previous requests made regarding groundwater contamination in the Elm Point Wellfield including:

1. Installation of additional groundwater monitoring locations throughout OU-4 to assess the nature and extent of the expanding contamination plume emanating from beneath the Ameren Huster Road Substation.
2. Increased frequency of groundwater monitoring within OU-3 and OU-4 (quarterly basis) with an expanded list of emerging and persistent contaminants including dioxins, furans, and per- and polyfluoroalkyl substances (PFAS).
3. Submission of a Groundwater Sampling and Analysis Plan, as well as verification that the contractors for the responsible parties are collecting groundwater samples in accordance with USEPA best practices.
4. Submission of a Quality Assurance Project Plans to ensure that all field and laboratory data meets the data quality objectives.
5. Laboratory analytical data should be validated to evaluate precision, accuracy, method compliance, and completeness of the individual data packages, and a summary of the data validation should be provided within a routine monitoring report that summarizes the findings from routine monitoring activities.
6. Submission of a Contingency Plan for events when the constituents of concern are detected at or above the MCL near the City of St. Charles production wells.

Prior to approving the work plan that was submitted for collecting the sample at the water treatment plant, the City of St. Charles is requesting a response regarding each of the requests previously made to the USEPA and Missouri DNR. Thank you so much for your time responding to these previous requests.

**Paul Michalski, P.G.**

Senior Hydrogeologist

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**From:** Meyer, Lisa A <[LMeyer2@ameren.com](mailto:LMeyer2@ameren.com)>  
**Sent:** Wednesday, October 26, 2022 2:49 PM  
**To:** [Nicholas.Galla@stcharlescitemo.gov](mailto:Nicholas.Galla@stcharlescitemo.gov); Paul Michalski <[paul.michalski@212environmental.com](mailto:paul.michalski@212environmental.com)>; [john.phillips@stcharlescitemo.gov](mailto:john.phillips@stcharlescitemo.gov); Todd Aseltyne <[todd.aseltyne@212environmental.com](mailto:todd.aseltyne@212environmental.com)>; Howell, Tonya <[howell.tonya@epa.gov](mailto:howell.tonya@epa.gov)>; Sperry, Clint <[Sperry.Clint@epa.gov](mailto:Sperry.Clint@epa.gov)>; Brown, Randolph <[Brown.Randolph@epa.gov](mailto:Brown.Randolph@epa.gov)>  
**Cc:** Giesmann, Craig J <[CGiesmann@ameren.com](mailto:CGiesmann@ameren.com)>; Knowles, Susan B <[SKnowles@ameren.com](mailto:SKnowles@ameren.com)>; Miller, Barbara J <[BMiller2@ameren.com](mailto:BMiller2@ameren.com)>; Moentmann, Jeannine L <[JMoentmann@ameren.com](mailto:JMoentmann@ameren.com)>  
**Subject:** City Water Plant Effluent Sampling

USEPA/City of St. Charles,

Attached is proposed work plan for VOC sampling at the effluent of the City of St. Charles' water treatment plant. Please feel free to contact me with questions, and to schedule LEA for this work.

Thanks,

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**LISA A. MEYER**

Consulting Engineer, Environmental Services

C 314.488.0151

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